

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

)
SMARTMATIC USA CORPORATION,)
SMARTMATIC INTERNATIONAL)
CORPORATION, and SMARTMATIC)
SERVICES CORPORATION)
) Civ. 13-05349 (KBF)
Plaintiffs,)
)
-v-)
)
DOMINION VOTING SYSTEMS)
CORPORATION and DOMINION VOTING)
SYSTEMS, INC.,)
)
Defendants.)
)

**DECLARATION OF GEORGE W. SHUSTER, JR. IN SUPPORT OF DOMINION'S
MEMORANDUM OF LAW IN FURTHER SUPPORT OF ITS MOTION TO DISMISS
THE COMPLAINT, OR, IN THE ALTERNATIVE, TO STAY THIS ACTION**

I, GEORGE W. SHUSTER, JR., hereby declare under penalty of perjury as follows:

1. I am a partner at the firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants Dominion Voting Systems Corporation and Dominion Voting Systems, Inc. (collectively, "Dominion") in the above-captioned action. I respectfully submit this Declaration in support of Dominion's Memorandum of Law in Further Support of Its Motion to Dismiss the Complaint, or, in the Alternative, to Stay This Action filed concurrently herewith.

2. Attached hereto as Exhibit A is a true and correct copy of the Memorandum of Law in Support of Plaintiffs' Motion to Remand and for Abstention, filed in *Smartmatic USA Corporation, Smartmatic International Corporation, and Smartmatic Services Corporation v. Dominion Voting Systems Corporation and Dominion Voting Systems, Inc.*, Civ. 13-05349 (KBF), Docket No. 26 (S.D.N.Y. August 30, 2013).

3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Tom H. Connolly, Chapter 7 Trustee for SVS Holdings, Inc., filed in *Smartmatic USA Corporation, Smartmatic International Corporation, and Smartmatic Services Corporation v. Dominion Voting Systems Corporation and Dominion Voting Systems, Inc.*, Civ. 13-05349 (KBF), Docket No. 30 (S.D.N.Y. August 30, 2013).

4. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 4, 2013

/s/ George W. Shuster, Jr.

George W. Shuster, Jr.
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Tel: (212) 230-8800

Counsel for Defendants Dominion Voting Systems Corporation and Dominion Voting Systems, Inc.